

AFFIDAVIT

I, Charles W. Burnham, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since 2009. In the course of my employment, I was asked to investigate James D. Pieron, Jr.'s claim that he had worked with the FBI and other entities in developing an automated fingerprint identification system. After conducting what I believed was a thorough investigation in 2012, summarized briefly below, I was not able to find any evidence that supported Pieron's claim that he had worked with the FBI and/or other entities in developing an automated fingerprint identification system.

2. In attempting to investigate Pieron's claim, I was never able to obtain any specific information regarding what entity employed Pieron to work on an automated fingerprint identification system, when he was so employed, who supervised his efforts, or what role he played.

3. After interviewing the person who was the FBI's automated fingerprint identification system project manager for over 30 years, I can say with confidence that Pieron was not employed by the FBI in connection with its AFIS system. The FBI's project manager reported that Pieron was not associated with the FBI's project, and that he had never heard of Pieron or JDFX Technologies.

4. I searched various FBI databases to determine if Pieron was an employee, and separately requested the BPMS (Bureau Personnel Management System) be searched by another FBI employee. We did not find any indication that Pieron was employed by the FBI in any capacity, including as a contract employee of the FBI or an employee of a contractor that worked with the FBI.

5. I conducted interviews with representatives of private sector corporations that are known to have worked on developing automated fingerprint identification systems. I asked the



human resource managers for those companies to search databases containing current and past employees and contractors. In every instance, Pieron's name was not found.

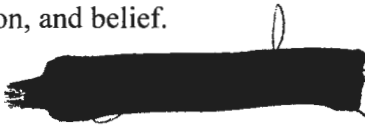
6. In addition, I interviewed people who worked on developing automated fingerprint identification system projects for several major companies. Again, the results were negative. The project participants I interviewed also often provided anecdotal information indicating that they and others that they have worked with for significant amounts of time do not recall Pieron nor did they remember hearing of Pieron being involved in the field of automated fingerprint identification.

7. In sum, the results of my investigation into Pieron's claim regarding work on an automated fingerprint identification system were universally negative.

**DECLARATION IN LIEU OF JURAT (28 U.S.C. §1746)**

I declare under penalty of perjury that the foregoing affidavit is true and correct to the best of my knowledge, information, and belief.

Executed on: January 24, 2020



Charles W. Burnham  
Special Agent, FBI



Notary Public

